REBUTTAL TESTIMONY OF

JERRY L. HAMPTON

ON BEHALF OF AMERITECH ILLINOIS

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Jerry L. Hampton. My business address is 350 N. Orleans, Chicago, Illinois 60654.

Q. Have you previously submitted direct testimony in this proceeding?

A. Yes, I have.

II. PURPOSE AND ORGANIZATION OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my rebuttal testimony is to respond to the positions presented by the following witnesses:

- Mr. Christopher L. Graves sponsored by the Telecommunications Division of the Illinois Commerce Commission
- Dr. August H. Ankum sponsored by AT&T Communications of Illinois and WorldCom, Inc.
- Mr. James D. Webber sponsored by CoreComm Illinois, Inc.
- Mr. Joseph Gillan sponsored by AT&T Communications of Illinois, the PACE Coalition, and Z-TEL Communications

I will address issues regarding Ameritech Illinois' Unbundled Local Switching with Shared Transport ("ULS-ST") offering. Specifically, I will respond to the following items:

- I address the appropriate pricing structure for Unbundled Local Switching ("ULS") as used in ULS-ST and why, in my opinion, a "flat-rate" price is not appropriate.
- I will demonstrate that it would be improper and bad policy to allow competitive local exchange carriers ("CLECs") to use Shared Transport to carry intraLATA toll traffic.
- I will address Dr. Ankum's concerns regarding the rate for the Daily Usage Feed.
- I will address issues related to custom routing of Operator Services and Directory Assistance ("OS/DA") traffic raised by Mr. Gillan.
- Finally, I will address the status of the transiting service offered as part of ULS-ST, an issue raised by Mr. Gillan.

Q. Do you have any Schedules to your testimony?

A. Yes, I have the following Schedule:

Schedule JLH-3 - Proposed updated Sheets to Unbundled Local Switching (ULS) for AIN Custom Routing for use with ULS-ST (Tariff ILL. C.C. No. 20, Part 19, Section 3)

III. ULS RATE STRUCTURE

Q. What is your understanding of what Mr. Graves, Dr. Ankum, and Mr. Gillan are proposing with respect to the rate structure for ULS?

A. Mr. Graves, Dr. Ankum, and Mr. Gillan are proposing that the ULS port be priced on a flat rate basis with no usage sensitive pricing. They argue that Ameritech Illinois was previously ordered to rate ULS on a flat rate basis, that Ameritech Illinois does not have the ability to now request a usage based element, and mistakenly contend that Ameritech

Illinois should not charge usage sensitive rates because it does not incur usage sensitive costs.

Q. Do you agree with Mr. Graves, Mr. Gillan, and Dr. Ankum that Ameritech Illinois should have a flat-rate pricing structure for ULS?

A. I do not. As explained in Mr. Palmer's testimony, Ameritech Illinois does incur usage sensitive costs when providing ULS. Moreover, as Mr. Palmer also explains, flat rate pricing can cause some users to subsidize others. Therefore, a usage sensitive ULS rate is most appropriate.

Q. Is this really a ULS-ST issue?

A. No, it is not. This proceeding was specifically initiated to address the ULS-ST offering and Ameritech Illinois' Unbundled Network Element Platform offering ("UNE-P"). As described in my direct testimony, the ULS-ST offering is a combination of the ULS UNE and the Shared Transport UNE. The ULS component of ULS-ST is identical to the ULS offering. As pointed out by Mr. Graves (Graves Direct at 15) and as can be seen in the ULS-ST tariff (Schedule JLH-1, Sheets 42-45), there are no rates reflected for the ULS portion; rather these are established in the ULS tariff (Tariff ILL. C.C. No. 20, Part 19, Section 3). The ULS port rate for ULS-ST is, therefore, the rate as found in the ULS tariff.

Q. Why did Ameritech Illinois introduce a usage charge in the Unbundled Local Switching with Shared Transport (ULS-ST) tariff?

A. First, as explained in Mr. Palmer's testimony, Ameritech Illinois does incur usage sensitive costs on calls made from ULS ports. Second, Ameritech Illinois, as well as various CLECs, desire a rate structure similar to that in the other Ameritech states, other SBC states, and other providers of Shared Transport. A rate structure for ULS-ST containing a usage charge meets that desire.

Q. Do you agree with Mr. Gillan's statement that average utilization of the network will change little (Gillan Direct at 18) with the introduction of ULS-ST and UNE-P?

A. No, I do not. In fact, Mr. Gillan contradicted this same argument himself in testimony that he presented in both Michigan[1] and Ohio[2]. In his testimony in both of those dockets Mr. Gillan made the point that innovation means inventing new uses of the telecommunication network. He stated: "Indeed, it is difficult to imagine an innovation that did not involve usage." He even posited that under flat rate pricing carriers would be likely to offer free blocks of long distance calling as part of basic service packages. Such new uses of the network will mean increases in usage. Mr. Gillan's own perspective indicates the possibility, and likelihood, of significant increases in usage volumes. This is usage that Ameritech Illinois has not planned for within its network and it therefore poses additional costs for Ameritech Illinois. If there is an increase in usage, then there will be increased and unplanned usage demanded of the serving switches.

[1] Michigan Case No. U-12622, Direct Testimony of Joseph Gillan on behalf of AT&T Communications of Michigan, Inc. and TCG Detroit, page 10.
[2] Ohio Case No. 00-1368-TP-ATA, Direct Testimony of Joseph Gillan on behalf of CoreComm Newco, Inc., The Pace Coalition, AT&T Communications of Ohio, Inc., and TCG Ohio, pages 12-13.

A usage-based rate accounts for the fact that an innovation created by one CLEC that increases usage will not cause an increase in rates to other CLECs. It also assures that Ameritech Illinois, or another CLEC, whose end users may utilize less than the average amount of usage on the switch, is not forced into subsidizing CLECs whose end users utilize more than the average amount of usage on the switch. Therefore, usage based pricing places the burden of paying for resources used on the one using those resources. Said another way, the cost causer pays.

Q. Why would a CLEC want flat rate pricing and when is it beneficial to them?

A. A rational CLEC is only interested in flat rate pricing when it believes that it will have a higher amount of usage than others on average. Since that CLEC's end users will be using more of the capacity of the switch than another CLEC, or perhaps even Ameritech Illinois' end users, they are getting others to pay for the capacity that they use above the average amount. This type of action is not appropriate in a competitive environment, nor does it meet with the "cost causer pays" concept.

Q. Are you aware of any other state that has imposed a flat rate pricing for ULS or any company that does not have a usage component for ULS?

A. No, I am not. All other states served by Ameritech have a usage element as part of the rates for ULS. All other SBC ILEC companies have a usage element as part of the rates for ULS. Lastly, all other Local Exchange Carriers (LECs) that I know of have a usage element as part of the rates for ULS.

Q. Should the ULS Port rate change as a result of the introduction of a usage charge for ULS-ST ?

A. Since rates are based on costs, this is a cost question and is addressed in the testimony of Mr. Palmer. Again, as stated earlier, as far as ULS-ST is concerned this rate is the ULS port rate. It should also be noted that the rate structure for ULS-ST and the rate structure for the individual ULS UNE product should be the same.

IV. INTRALATA TOLL OVER SHARED TRANSPORT

Q. Mr. Graves, Mr. Webber, and Mr. Gillan all claim that Ameritech Illinois has placed improper restrictions on the use of Shared Transport for intraLATA toll. Is this correct?

A. No, it is not. As explained in my Direct Testimony (Hampton Direct at 15-16) a CLEC may utilize shared transport for intraLATA toll in exactly the same manner that Ameritech Illinois does. This means a CLEC's end user call will be carried over shared transport to the end user's presubscribed intraLATA carrier. This is identical to what occurs for an Ameritech Illinois end user's call.

Q. Mr. Webber claims that Ameritech Illinois "intends to force-route the CLECs' UNE-P based intraLATA toll traffic out to an interexchange carrier's POP" and that this routing "discriminates against CLECs because their UNE-P based intraLATA toll traffic will be sent out to the separate network of an IXC" (Webber Direct at 6). Are these statements true?

A. No, they are not. First, what Ameritech Illinois has stated is that shared transport requires Ameritech Illinois to utilize the standard routing tables contained in its switches as required by the FCC's Shared Transport order[3] (Hampton Direct at 16). Since the implementation of intraLATA toll dialing parity in Ameritech Illinois, these routing tables are built to automatically direct any intraLATA toll call to the end user's presubscribed carrier. IntraLATA toll providers fought hard to obtain toll dialing parity with the ILECs, and having won that capability now disingenuously declare that the routing mandated to provide that parity is discriminatory. There is nothing "forced" about this routing and it is non-discriminatory because each carrier's presubscribed traffic is treated identically according to the standard routing instructions in the switch. As new intraLATA toll providers enter this already competitive market the routing tables are updated to add them as well. To do otherwise (i.e., to route intraLATA toll traffic outside the toll network) would be "force-routing" and discriminatory to all existing intraLATA toll providers.

Q. Can you explain the rationale for Ameritech Illinois' position?

A. Ameritech Illinois is opposed to allowing another intraLATA toll provider to use Ameritech Illinois' intraLATA toll network to deliver its intraLATA toll calls. The intraLATA toll network is not the shared transport network, but is an area of the telecommunications market that has been opened to competition for years, and in fact has very robust competition. Ameritech Illinois finds the CLECs' request very curious, especially coming from AT&T and WorldCom, when considered in light of the history of equal access. Since the advent of access, AT&T and others sought to have intraLATA

[3] Third Recon Order. CC Docket 96-08, 12 FCC Rcd 12460, ¶ 36.

toll provided on an equal access basis. Congress, at AT&T's urging, allowed states to require that intraLATA toll be provided under an equal access scenario, often referred to as intraLATA toll dialing parity, pursuant to certain time frames. See 47 U.S.C. 271(e)(2)(B).[4] IntraLATA toll dialing parity was important to carriers like AT&T and Worldcom because, among other things, it allows intraLATA toll calls to be handed off directly to their toll network. The introduction of intraLATA toll dialing parity increased competition in that market, giving end users even more choices. Now, however, AT&T is essentially asking this Commission to reverse what AT&T had asked for previously when lobbying for an intraLATA equal access requirement. The CLECs are asking to have their intraLATA toll subscribers' traffic routed over Ameritech Illinois' intraLATA toll network and avoiding their own toll network altogether. It must be noted that Ameritech Illinois was required to go to a great deal of expense to change central office software and provisioning systems and to modify routing tables to accept and recognize the specific CICs of the individual intraLATA toll carriers in order to ensure that each carrier received the traffic of its subscribers. The CLECs and Staff now want to have Ameritech Illinois go to additional expense to ensure that their intraLATA toll customers' traffic does *not* go over their network, but rather uses Ameritech Illinois' intraLATA toll network. A basic purpose of unbundling is to help promote competition in a market where it may not currently exist; the intraLATA toll market, however, is already very competitive and does not need any such "jump-start."

Q. Are you saying that Ameritech Illinois' intraLATA toll network is different than its local network?

[4] Carriers also clamored for intraLATA toll dialing parity in Illinois.

A. Yes, I am. The trunks and transport used to connect intraLATA toll points of the network are separate and unique from the trunks and transport used to connect local points in the network. The routing tables in an office are designed to point intraLATA toll traffic presubscribed to Ameritech Illinois to Ameritech Illinois' intraLATA toll trunks, just as they point presubscribed intraLATA toll traffic of other providers to their intraLATA toll trunk ports.

Q. Mr. Webber claims that because Ameritech Illinois will not let an intraLATA toll provider route its traffic over Ameritech Illinois' intraLATA toll network the CLEC must pay an IXC to carry its intraLATA toll traffic. Is this true?

A. Actually just the opposite is true. As provided in the FCC's Shared Transport Order[5], when a CLEC uses ULS-ST to serve an end user they are the ones who are entitled to bill for exchange access service. This means that they would bill the intraLATA toll provider the originating access charges for this call.

Q. Mr. Webber and Mr. Gillan state that custom routing is not needed in order to route another intraLATA toll providers traffic over Ameritech Illinois' intraLATA toll network because the intraLATA toll provider can just use Ameritech Illinois' CIC to route the traffic. Is this correct?

A. No, this is not correct. As you recall, a CIC (Carrier Identification Code) is a value used to identify an end user's presubscribed intraLATA and interLATA toll provider. As I explained earlier, Ameritech Illinois' processing of an intraLATA toll call begins by determining what intraLATA toll provider the end user is presubscribed to. This is done

by looking at the information stored in the switch regarding the port originating the call (i.e., it looks up the CIC of the provider). The switch then uses this information to determine how to route the traffic to that intraLATA toll provider by looking up information stored in the switch's standard routing tables. Mr. Webber and Mr. Gillan are correct in that if the switch is provided Ameritech Illinois' CIC it will route the traffic over Ameritech Illinois' intraLATA toll network. Mr. Webber and Mr. Gillan are proposing that Ameritech Illinois trick the switch by delivering Ameritech Illinois' CIC to the switch, even though the CLEC's end user is not presubscribed to Ameritech Illinois for intraLATA toll and therefore, does not have Ameritech Illinois' CIC associated with their line port. This is where new custom routing instructions would have to be created. Any solution would require some type of alteration to the standard switch routing tables to allow use of the same CIC for two (or more) different intraLATA toll providers – even though the very purpose of CICs is to distinguish specific toll providers from one another. This need to create custom routing instructions in the routing tables, instead of utilizing the standard routing tables, conflicts with the FCC's definition of shared transport (Hampton Direct at 15-16).

Although I am not a lawyer, it is my understanding that a CLEC can only use shared transport to provide exchange access service where it is also the local service provider for that particular end user. Therefore, any intraLATA toll customer that did *not* also use the same provider for local service could not be served by shared transport, and thus would have to have its traffic routed with a different CIC code than customers that did use the same provider for both local and intraLATA toll service. This would also be the case for

[5] Third Recon Order, 12 FCC Rcd 12460, ¶ 39.

every interLATA customer that did not use the same provider for local exchange service. All of this would lead to a proliferation of CIC codes and custom routing demands that are unnecessarily complex.

Q. Mr. Graves, Mr. Webber, and Mr. Gillan point to the fact that SBC in Texas, Kansas, and Oklahoma have agreed to routing other provider's intraLATA toll over their networks. Can you respond to this issue?

A. Yes, I can. Mr. Graves and Mr. Webber point to an order from the Texas Public Utilities Commission, that requires Southwestern Bell Telephone (SWBT) in Texas to route intraLATA toll over shared transport. This Texas PUC decision was a resolution of a dispute as to the interpretation of a specific interconnection agreement between the two parties. It is also important to note that this ruling is dated November 4, 1999. As pointed out by Mr. Graves, Mr. Gillan, and Mr. Webber the FCC Merger condition requires the Ameritech shared transport offering to be the same terms and conditions (other than rate structure and price) that are substantially similar to (or more favorable than) the most favorable terms SBC/Ameritech offered to telecommunications carriers in Texas as of August 27, 1999. The shared transport offering in Texas as of August 27, 1999 did not include the termination of intraLATA toll traffic and therefore there is no Merger condition that requires Ameritech Illinois to offer the termination of other provider's intraLATA toll traffic over Ameritech Illinois' intraLATA toll network. In Kansas and Oklahoma SBC agreed to allow intraLATA toll over shared transport only in conjunction with obtaining 271 approval in those states.

Q. Mr. Webber and Mr. Gillan want this Commission to believe that just because the Texas PUC ordered SWBT to allow intraLATA toll over shared transport that everything works fine. Besides the need for custom routing and unnecessary proliferation of CIC codes, are there any other problems with utilizing the network in this manner?

A. Yes, there are several practical difficulties. These include some major billing difficulties for Ameritech Illinois, CLECs, and other providers alike. At this point, SBC has not been able to identify all of the associated problems. Mr. Webber states that the Texas PUC found that the CIC is not needed for billing purposes (Webber Direct at 9-10). The Texas PUC is only partially right. The CIC is not required for Ameritech Illinois to bill the originating CLEC the ULS or shared transport charges. However, the CIC is also used for billing for terminating access by the LEC where the traffic terminates. The LEC that has the end user where the traffic terminates is entitled to terminating access. If that LEC is a CLEC providing service via ULS-ST it would receive a terminating record that identifies Ameritech Illinois as the intraLATA toll provider. In a situation where the call terminates to a switch belonging to a LEC other than Ameritech Illinois (such as facilities based CLECs, independent companies, and wireless providers) that switch will record a record reflecting Ameritech Illinois as the intraLATA toll provider (that is, the provider whose CIC is in the call record). The terminating LEC that has the end user would then attempt to bill Ameritech Illinois access charges for the intraLATA toll traffic. Ameritech Illinois would not be the party responsible for the access charges since it would not be the provider of intraLATA toll; rather the responsible party would be the CLEC that is purchasing the ULS-ST and serving the originating end user. The

Commission must understand that this is not a problem only for Ameritech Illinois, but also for all local service providers, both those who utilize ULS-ST to serve end users and other facilities-based providers. Other than the telephone number itself and the CIC, there is nothing in a terminating record that any LEC could use to determine which intraLATA toll provider it should bill. No industry-wide resource exists that would allow carriers to utilize the line number to identify the CLEC involved with a call originated from a ULT-ST port. Ameritech Illinois, like SWBT, would have to develop some way to assure that it is not billed in error for access charges that should be paid by other intraLATA toll providers. Identification and rejection of these charges would delay the ability of the terminating LEC to collect its charges. At best, Ameritech Illinois may only be able to identify that the end user originating the call does not subscribe to Ameritech Illinois' intraLATA toll service, which still does not tell the terminating LEC who to collect from.

These billing problems also would make it much more difficult for Ameritech Illinois to provide intraLATA toll to end users that choose a CLEC for their local service provider. Again, the problem would be identifying which customers are actually subscribed to Ameritech Illinois for toll service and which ones are subscribed to someone else for toll service but are using the Ameritech Illinois CIC.

These problems would only multiply rapidly as more and more intraLATA toll providers utilized the single Ameritech Illinois CIC to route their traffic over Ameritech Illinois' network.

All of these problems can be avoided by allowing the network to continue to work in the manner that it does today, utilizing the standard routing tables to route intraLATA toll as envisioned by the FCC's definition of shared transport.

Q. If the Commission were to determine that Ameritech Illinois must allow intraLATA toll providers to use shared transport for their intraLATA toll traffic are there any other items it needs to consider?

A. Yes, there are. First, the Commission would need to reiterate the FCC requirement that intraLATA toll providers may only utilize shared transport for intraLATA toll where they are the end user's local service provider.[6] The other consideration is that the assumptions underlying the ULS-ST rate development would no longer be valid. When Ameritech Illinois performed the cost studies underlying the rates for ULS-ST it understood that shared transport could only be used for local service. Thus, the Ameritech Illinois cost studies for ULS-ST usage assumed the only traffic being carried between Ameritech Illinois' End Offices would be local traffic. If intraLATA toll service providers are allowed to use ULS-ST to carry intraLATA toll traffic it is my understanding that cost work should be redone for the ULS-ST Blended Transport rate to account for that type of usage.

V. DAILY USAGE FEED RATE

Q. Dr. Ankum states in his testimony that the Daily Usage Feed charges are entirely unsubstantiated. How do you respond?

A. Dr. Ankum is incorrect. First, as with other charges that were already determined in the docket that put in place the ULS tariff, the Daily Usage Feed rate element is incorporated by reference in the ULS-ST tariff (Schedule JLH-1, Sheet 45). Mr. Graves mentions this fact in his testimony (Graves Direct at 16). There is no need to submit costs for something that has already been approved and has not changed. Second, this rate element has nothing to do with the usage measuring equipment in the switch. As stated in the description of the charge in the ULS-ST tariff (Schedule JLH-1, Sheet 41), this rate element recovers for creating and transmitting a report containing usage records to the CLEC on a daily basis so that they can bill their end users.

VI. CUSTOM ROUTING OF OS/DA TRAFFIC

Q. Mr. Gillan makes several claims regarding the custom routing of OS/DA traffic associated with ULS-ST. How do you respond?

A. Mr. Gillan's main argument is that Ameritech Illinois should not be allowed to withdraw UNE pricing of OS/DA services because CLECs are not happy with the custom routing that Ameritech Illinois makes available. He proceeds to argue that the issue is not whether OS and DA can be obtained from alternative sources, but rather concerns whether OS and DA traffic can be efficiently delivered to other providers so that entrants have a meaningful choice (Gillan at 38-39).

Ameritech Illinois disagrees with Mr. Gillan. The FCC UNE Remand Order is clear on what is required. It states in paragraph 441:

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[6] Third Recon Order, CC Docket 96-08, 12 FCC Rcd 12460, ¶ 39.

> We find that where incumbent LECs provide customized routing, lack of access to the incumbents' OS/DA service on an unbundled basis does not materially diminish a requesting carrier's ability to offer telecommunications service.

The footnote 867 associated with that paragraph is also instructive:

> Customized routing permits requesting carriers to designate the particular outgoing trunks associated with unbundled switching provided by the incumbent, which will carry certain classes of traffic originating from the requesting provider's customers. This feature would allow the requesting carrier to specify that OS/DA traffic from its customers be routed over designated trunks which terminate at the requesting carrier's OS/DA platform or a third party's OS/DA platform.

As Mr. Kirksey also discusses in his rebuttal testimony, Ameritech Illinois does provide for customized routing of OS and DA traffic so that a CLEC can choose an alternative OS and/or DA provider. This is the requirement that Ameritech Illinois must meet in order to provide OS/DA services at market based prices and withdraw the UNE pricing. In conjunction with ULS-ST Ameritech Illinois makes available an AIN based custom routing solution as described in the proposed tariff attached as Schedule JLH-3. Mr. Palmer provides the cost support for this tariff in his rebuttal testimony.

Ameritech Illinois agrees with Mr. Gillan's statement that CLECs need a known, reliable, and efficient mechanism to deliver OS/DA traffic to their provider of choice (Gillan Direct at 39). Ameritech Illinois has provided that. In fact the routing methodology Ameritech Illinois makes available is the one that it uses itself. Although Ameritech Illinois' solution requires a CLEC to route their OS/DA traffic to a unique outgoing trunk port to their alternative OS/DA provider at each central office where they provide service

via ULS-ST, this requirement fully complies with the description provided in the footnote provided above from the FCC's UNE Remand Order.

As to Mr. Gillan's proposal for a different type of custom routing than that which is currently delineated in the ULS-ST or ULS tariffs, the tariff specifically gives the CLECs another vehicle for requesting a different arrangement. At Original Sheet 8 of the ULS-ST Tariff it states: "Other requests for custom OS/DA provisioning can be requested via the Bona Fide Request process." (See Schedule JLH-1, Sheet 8).

VII. ULS-ST TRANSIT SERVICE

Q. Mr. Gillan states that this Commission should find that the "transit" function is a regulatory obligation of shared transport. How do you respond?

A. I believe that Mr. Gillan is very aware of how the FCC has defined shared transport and knows that there is no transit obligation in that definition. I discussed transiting at length in my direct testimony (Hampton Direct at 13-15) and I note that Mr. Gillan has not provided any FCC authority for a different conclusion. I am sure that he is also aware that the FCC rules are very specific in defining the transport between a CLEC and an Ameritech End Office as being dedicated transport.[7] Therefore, there is no obligation to provide transiting as a part of shared transport. Mr. Gillan also argues that in a MCI arbitration, the Commission found that Ameritech Illinois must offer transit to CLECs in Illinois, even if a parallel obligation did not exist under federal law (Gillan Direct at 29). The reference Mr. Gillan cites, however, is one related to interconnection and what must

[7] FCC's Third Recon Order, para. 27.

occur when MCI connects its switches to Ameritech Illinois' network. Although I am not a lawyer, it is my understanding that these two situations are not similar.

However, as I stated in my direct testimony, Ameritech Illinois has voluntarily chosen to make transiting a part of our ULS-ST offering. As with any tariffed service we would not be able to remove it for arbitrary reasons, as Mr. Gillan implies.

Q. In the section discussing Ameritech Illinois' ULS-ST transit offering Mr. Gillan has a footnote (Gillan Direct, page 29 fn. 32) which states that Ameritech Illinois has not made a clear and unequivocal admission that the CLEC is entitled to the exchange access charges when using ULS-ST and that the Commission must make this clear. Would you like to comment?

A. Yes, I would. First, I refer Mr. Gillan to the ULS-ST tariff (Schedule JLH-1) attached to my direct testimony. On Original Sheet 5 it reflects the FCC requirement that originating and terminating access belongs to the CLEC subscribing to the ULS-ST. Second, I refer Mr. Gillan to my direct testimony which in several places on pages 6, 8, and 9 recognizes that the CLEC is the one entitled to the originating and terminating access on a ULS-ST port. Lastly, I refer Mr. Gillan to the call flows (Schedule JLH-2) which reflect the CLEC billing for access charges in flows 15 through 25. Ameritech Illinois has made it clear that the CLEC is entitled to the exchange access charges when using ULS-ST.

Q. Does this conclude your direct testimony?

A. Yes, it does.

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PART 19 - Unbundled Network Elements and Number Portability
SECTION 3 - Unbundled Local Switching

2nd Revised Sheet No. 6
Cancels
1st Revised Sheet No. 6

1. **UNBUNDLED LOCAL SWITCHING (cont'd)**

A. *DESCRIPTION (cont'd)*

Unbundled Local Switching (ULS) (cont'd)

Custom Routing Capabilities: (T)

Custom Routing via Line Class Code (N)

The line class code identifies all attributes of the port including by call type any routing or blocking instructions. The routing instructions include reference to the appropriate network route arrangement by call type. The requesting carrier's instructions for custom routing are used to either identify an existing line class code/network route combination or indicate the need for development of a new line class code or network route to implement such instructions.

ULS provides any technically feasible customized routing by class-of-call (e.g.: operator, directory assistance, toll, local, etc.) by developing, establishing and maintaining new line class codes and/or new network routes which will direct custom routed calls by call type to a ULS Trunk Port as required by the telecommunications carrier, while meeting all requirements for long term number portability. However, custom routing via line class codes cannot be used with ULS-Shared Transport (ULS-ST is described further in Section 21 of this Tariff). The custom routing option for use with ULS-ST is described in "Custom Routing of OS and/or DA via Advanced Intelligent Network (AIN) for use with ULS-ST" following. (N) (N)

Pursuant to F.C.C. Third Order on Reconsideration and Further Notice of Proposed Rulemaking (F.C.C. 97-295, para. 25 and para. 28), standard/existing routing of calls between Company end offices, between Company tandems and between Company tandems and end offices is to be provided and routed to the FCC-DST. The requesting telecommunications carrier must specify routing for all call types to be connected to other switches (e.g. ICO, wireless, CLEC and IXC end offices/tandems).

When a telecommunications carrier requests routing of a specific call type to a trunk group which has not been established in the Company's network routing, custom routing needs to be established to support the custom routing request. The application of the Custom Routing rates is shown in E. RATE APPLICATION following and Custom Routed rates are shown in F.1 Prices following.

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PART 19 - Unbundled Network Elements and Number Portability
SECTION 3 - Unbundled Local Switching

2nd Revised Sheet No. 7
Cancels
1st Revised Sheet No. 7

1. UNBUNDLED LOCAL SWITCHING (cont'd)

A. *DESCRIPTION (cont'd)*

Unbundled Local Switching (ULS) (cont'd)

Custom Routing Capabilities (cont'd): (T)

Custom Routing via Line Class Code (cont'd): (N)

At the request of the telecommunications carrier, the ULS Trunk Port may be cross connected with transport provided by the telecommunications carrier or third party, or the telecommunications carrier may cross connect the ULS Trunk Port to the Company's dedicated Unbundled Interoffice Transport as described in Section 12 in the telecommunications carrier's Collocation space. Cross connection of the FCC-DST Trunk Port to the FCC-DST cannot be described until further clarification from the Commission as to the provision of ULS unbundled from FCC-DST can be accomplished. (See Sheet 3.1, footnote /1/ of this Section.)

For Custom Routing provisioning requirements, see Service Parameters - Ordering as shown in this Section and Part 23, Section 4 of this Tariff for Collocation regulations and rates. Any other request for Custom Routing provisioning, other than described above, can be requested via the Bona Fide Request Process.

Custom Routing of OS and/or DA via AIN for use only with Unbundled Local Switching with Shared Transport (ULS-ST) (N)

The custom routing option available for Operator Services and/or Directory Assistance ("OS/DA") traffic, when originating from a ULS port for which Unbundled Shared Transport is also purchased, uses the AIN technology used to provide ULS-ST. A requesting carrier can elect a single route for all OS, a single route for all DA, or a single route for all OS and DA calls from ULS ports in an end office switch. The custom routing election chosen by that requesting carrier will be used to direct all local OS and/or local DA calls to a specific trunk group associated with an ULS Trunk Port or over an existing dedicated trunk. (N)

/1/

/1/ Material now appears on Original Sheet No. 7.1 in this Section.

Issued: Effective:

By Christy L. Strawman, Vice President - Regulatory Affairs
225 West Randolph Street
Chicago, Illinois 60606

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PART 19 - Unbundled Network Elements and Number Portability
SECTION 3 - Unbundled Local Switching

Original Sheet No. 7.1

1. **UNBUNDLED LOCAL SWITCHING (cont'd)**

A. *DESCRIPTION (cont'd)*

Custom Routing of OS and/or DA via AIN for use only with Unbundled Local Switching with Shared Transport (ULS-ST) **(cont'd)** (N)

When a requesting carrier selects custom routing of OS/DA calls via AIN for ULS-ST, all end users served by that carrier using ULS-ST in that end office switch will use the same custom route(s) for all OS traffic or all DA calls.

The application of the Custom Routing rates is shown in E. RATE APPLICATION following and Custom Routed rates are shown in F.1 Prices.

For Custom Routing provisioning requirements, see Service Parameters - Ordering as shown in this Section and Part 23, Section 4 of this Tariff for Collocation regulations and rates. Any other request for Custom Routing provisioning, other than described above, can be requested via the Bona Fide Request Process. (N)

ULS Switch Usage /1/

ULS switch usage provides for the switching of calls originating between a telecommunications carrier's unbundled line ports or trunk ports and any other line-side or trunk-side port with line-side attributes served by any provider within the same switch (see A. DESCRIPTIONS, Unbundled Local Switching, preceding for a description of these port types). A ULS usage charge applies for all such telecommunications carrier's end user originated calls, whether originating on the line-side or trunk-side of the switch. The application for the ULS switch usage charge is shown in E. RATE APPLICATION and the ULS usage charge rate is shown in *F. PRICES* following.

Until some workable solution can be developed to measure terminating minutes-of-use and a way to identify the orginating line port owner on certain types of calls has been developed and successfully tested and found compatible with the Company's network, all minutes-of-use will be billed to the originating telecommunications carrier. /1/

/1/ Material formerly appeared on 1st Revised Sheet No. 7 in this Section.

Issued: Effective:

By Christy L. Strawman, Vice President - Regulatory Affairs
225 West Randolph Street
Chicago, Illinois 60606

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ILL. C.C. NO. 20
PART 19 | SECTION 3

PART 19 - Unbundled Network Elements and Number Portability
SECTION 3 - Unbundled Local Switching

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1. **UNBUNDLED LOCAL SWITCHING (cont'd)**

E. RATE APPLICATION (cont'd)

Custom Routing Nonrecurring Charge

Custom Routing via Line Class Code: (N)

New LCC, per LCC, per switch - is applicable when a telecommunications carrier requests switch routing that is not already available through an established ULS Custom Routing LCC and is applied for each central office in which a telecommunications carrier requests the activation of a new line class code.

New Network Routing, per route, per switch - is applicable when a telecommunications carrier requests routing that is not already available through an established Company Network Routing table and is applied to each central office in which a telecommunications carrier requests the activation and is applied to each requested route. For example, a request to establish a route for 0- calls in one of the Company end offices would have one new Network Routing charge applied. (0-, 00-, 1411, 7D local are examples of the different types of available call types that can be routed and one Network Routing charge would apply to each call type established.) (T)

Custom Routing of OS or DA via AIN using ULS-ST: (N)

New Custom Routing of OS or DA traffic via AIN using ULS-ST, per route, per switch – applies in each instance when a telecommunications carrier establishes or changes the custom routing of OS and/or DA traffic at an end office switch where it subscribes to ULS-ST. By way of example, if a carrier chooses to custom route OS traffic over one trunk group and DA over a different trunk group, then this charge would apply twice. (N)

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1st Revised Sheet No. 42
Cancels
Original Sheet No. 42

1. **UNBUNDLED LOCAL SWITCHING (cont'd)**

F. PRICES (cont'd)

1. ***Service Elements (cont'd)***

Description /Billing Code/	Nonrecurring Charge	Monthly Price	
Service Coordination Fee, per carrier bill, per switch		$1.15	
Subsequent Training, per Company person, per hour	$ 80.14	-	
ULS Billing Establishment Charge, per carrier, per switch	138.12	-	
Custom Routing via Line Class Code,			(C)
New LCC, per LCC, per switch	232.00		
New Network Routing, per route, per switch	TBD/1/		
Custom Routing of OS or DA via AIN (only for use ULS-ST),			(N)
New Custom OS or DA Route for ULS-ST, per carrier, per switch, per route	131.45	-	(N)

	Minute-of-Use
ULS Switch Usage over 1,622 minutes-of-use per minute-of-use or fraction thereof	TBD

	Message
Daily Usage Feed per message	$.000918

/1/ For the reasons more fully stated in the prepared testimony of Demetria A. Lonis, to be filed April 3, 1998, in Ill. C.C. Docket Nos. 96-0486/0569 Consolidated, further action by the Commission is necessary to complete rates as noted above as to be determined ("TBD").

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